

# Gulf of Alaska Keeper

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**Via:** Email to [dfg.evos.nepacomments@alaska.gov](mailto:dfg.evos.nepacomments@alaska.gov)

Laurel Jennings  
Exxon Valdez Oil Spill Trustee Council  
441 West 5<sup>th</sup> Avenue  
Suite 500  
Anchorage, AK 99501

**Re: Gulf of Alaska Keeper Comments on Notice of Intent to Prepare Supplemental EIS on the EVOS Trustee Council's Restoration Efforts**

Ms. Jennings:

On behalf of Gulf of Alaska Keeper, I respectfully submit the following comments.

## **Background**

Gulf of Alaska Keeper (GoAK) members, with the help of hundreds of volunteers and financial support from NOAA and MCAF, have conducted large-scale marine-debris cleanups in Prince William Sound and along the Kenai Peninsula's Gulf of Alaska coastline for the past 8 years. Since 2006, GoAK removed over 500,000 pounds of plastic marine debris from 800 miles of coastal habitat. GoAK has also established 17 marine-debris monitoring plots in Prince William Sound and on the Kenai Peninsula coast. The plots are cleaned annually to ascertain marine debris compositional changes and accumulation rates over time. GoAK has also conducted over 1200 miles of marine-debris surveys within this same area.

GoAK's marine-debris projects are all within the footprint of the Exxon Valdez oil spill. In fact, every season GoAK removes large quantities of marine-debris left from the Exxon Valdez oil-spill cleanup. Pom-poms, oil-containment booms, and rope mops are some of the Exxon Valdez oil-spill debris (infamously referred to as spill-swill) that GoAK collects each cleanup season. Much of the oil-spill-cleanup debris is still saturated with weathered oil and is dispersed widely throughout the sound.

While a great deal of marine-debris remediation has been accomplished in the spill area, it is clear from marine-debris surveys that much more needs to be done, and will need to continue to be done far into the future. GoAK estimates that over 300 tons of plastic marine debris litters just the shoreline of Montague Island. Hinchinbrook and Kayak Islands have similar densities of marine debris choking their sensitive coastal habitat. These Prince William Sound shorelines and others along the Kenai Peninsula coast have some of the dirtiest, possibly the dirtiest, shorelines in the world. In many areas, tons of toxic plastic debris per mile smother coastal habitat for hundreds of yards into surrounding forests. For example, GoAK removed 25 tons of plastic debris from one ½-mile-long Kenai Peninsula Gulf of Alaska beach. Layers of broken plastic bits, Styrofoam, bottles, floats and other items kill upland vegetation. Nets and ropes choke the mouths of anadromous streams. Estuarine and near-shore fresh-water rearing and spawning habitats are littered with nets, ropes, buoys, and nearly every other conceivable type of

plastic debris. Each season, containers of chemicals, fuels, detergents, lubricants, medicines, and other unknown agents wash upon shorelines in huge quantities. Unknown numbers of fish, birds, marine mammals, and terrestrial mammals ingest, or are entangled by, plastic marine debris. In addition, it has become increasingly clear over the past few years that not only does plastic marine debris cause direct physical harm to habitat and animals; its toxicity from inherent and absorbed chemicals is also likely causing substantial long-term damage to coastal ecosystems. While the death toll from the debris' physical impacts is staggering, the long-term damage from plastic marine-debris toxicity and other unknown chemicals may be far worse.

For many reasons, marine-debris cleanups in Prince William Sound and along the Kenai Peninsula are very labor intensive and expensive. There are enormous deposits of marine debris along a remote and extremely rugged coastline, extreme weather and surf make accessing beaches difficult, the cleanup work is nearly all accomplished by difficult hand labor, and marine-debris transportation and disposal costs are extremely high. Often, especially on Gulf of Alaska beaches, there are no safe anchorages for boats. Landing craft generally cannot safely access those beaches to remove the mountains of accumulated marine debris. In cleanup areas without safe vessel access, only helicopters can transport the gathered marine debris to the lee side of islands or to vessels in protected bays. These cleanup projects are very expensive. Montague Island is a case in point. Recently, GoAK estimated that a marine-debris cleanup of 75 miles of Montague Island eastern beaches would cost many millions of dollars. Unfortunately, that is just a fraction of the Prince William Sound area that needs cleaning.

For over 6 decades, plastic debris has accumulated in the marine environment. Huge concentrations of plastic debris drift in the gyres of the northern Pacific, assuring that marine debris will continue to be deposited on northern Gulf of Alaska beaches far into the foreseeable future. While GoAK has made great progress in removing 60 years worth of accumulated plastic debris from hundreds of miles of beaches, it is clear that plastic debris will continue to wash up on our shorelines for decades to come. Therefore, a continuous long-term maintenance cleanup project must be adopted to address the problem of ongoing marine-debris accumulation. Pouring a bunch of money into one-time marine-debris projects will not necessarily be an effective way to address the northern Gulf of Alaska marine-debris problem.

## Comments

Based on the above information, GoAK submits the following comments regarding the Council's restoration plan, specifically about several of the proposed restoration categories.

### 1. Herring.

With the large quantities of plastic marine debris littering known herring spawning beaches, combined with the unknown amounts of chemicals, medicines, fuel, lubricants, detergents, etc., washing ashore each year in these same areas, the Council should investigate whether these marine-debris factors are impacting herring health and inhibiting the ability of herring to recover.

2. Long-term Monitoring of Marine Conditions.

A long-term marine-debris monitoring project has been established in Prince William Sound and along the Kenai Peninsula coast. Most of this program has been accomplished with donated vessels and volunteer labor. It is time consuming and costly. This program needs to be expanded and continued. In order to insure the long-term viability of the marine-debris monitoring project, the Council should include funding for marine-debris monitoring under the proposed Long-term Monitoring of Marine Conditions project.

3. Harbor Protection and Marine Restoration, b. Marine Debris Removal.

The Council could easily spend all of the remaining money to fund a large one-time marine-debris remediation effort in the spill area. However, that would not be cost effective and, more importantly, would not remedy the problem of ongoing marine-debris accumulation. However, because marine-debris cleanups generate immediate and significant improvements in critical inter-tidal habitat, funding of marine-debris cleanups within the spill area by the Council is an excellent idea and entirely appropriate. But, given the scope of the marine-debris problem and the severe environmental impact it causes, much more than \$3 million is needed to address the spill area marine-debris problem. Therefore, GoAK recommends that a minimum of \$7 million be invested by the Council to combat marine-debris problems in Prince William Sound and along the Kenai Peninsula coast, and to also fund a long-term marine-debris maintenance cleanup project.

Thank you for this opportunity to comment.

Sincerely,

Chris Pallister  
President  
Gulf of Alaska Keeper